

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 08 CR 402
vs.)	
)	Judge Dow
Louis Burns)	Magistrate Judge Ashman

AGREED MOTION FOR TRAVEL OUTSIDE OF DISTRICT

NOW COMES the defendant Louis Burns, by his attorney Michael James Falconer , and moves this Court, pursuant to 18 U.S.C. §3142(c)(3), to modify his pretrial release order to allow him to travel to Normal, Illinois, for the Labor Day weekend, and in support thereof states as follows:

1. Under the terms of his pretrial release order, defendant Burns is restricted to the geographic confines of the Northern District of Illinois.
2. Defendant Burns is having a family gathering at his sister's house in Ittabena, Mississippi from August 28 to September 1, 2008, which defendant Burns desires to attend.
4. Defendant Burns will keep Pretrial Services informed of his itinerary and where he will be staying. Pretrial Services Officer Carrie Hobart has been consulted and has no objection to this motion.
4. AUSA Juliet Sorenson has advised counsel that he has no objection to the granting of this motion.

WHEREFORE defendant Louis Burns moves this Court to modify his conditions of his pretrial release to allow him to travel to Normal, Illinois, from August 27, to September 2, 2008.

Respectfully submitted,

_S/ Michael James Falconer
Attorney for Defendant

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